

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS EMILY ROSENBERG  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
APWU/USPS-T3-31**

The United States Postal Service hereby files the response of witness Emily Rosenberg to the above-identified interrogatory of the American Postal Workers Union dated April 6, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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## **RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

### **APWU/USPS-T3-31**

Please refer to your response to POIR 5 Question 4. The workbook "POIR 5 Q4 Attachment.xls" filed as your response to POIR 5 Question 4 identifies 121 post-network-rationalization Outgoing Priority facilities. Of these 121, 16 are NDCs. The workbook also identifies 120 post-network-rationalization Incoming Priority facilities, of which 7 are NDCs.

- a) Please identify all NDCs which conducted Outgoing Priority processing during FY 2010.
- b) Please identify the subset of the 16 post-network-rationalization NDCs that also did Outgoing Priority processing during FY 2010.
- c) Please identify all NDCs which conducted Incoming Priority processing during FY 2010.
- d) Please identify the subset of the 7 post-network-rationalization NDCs that also did Incoming Priority processing during FY 2010.

### **RESPONSE**

NDC processing of Priority Mail is not systemwide or routine. Available information for FY 2010 shows that such processing was limited to a particular day of the week in some locations or during the December volume surge at others.

(a-b) Cincinnati and Philadelphia.

(c) Cincinnati, Denver, Jacksonville, Minneapolis, Philadelphia, Seattle, Springfield. The majority of Atlanta's Priority Mail volume is processed at the L&DC, but there were scans on Priority Mail at the Atlanta NDC.

(d) Cincinnati, Jacksonville, Minneapolis, Philadelphia, and Springfield.